

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

| | | |
|--------------------------|---|---------------|
| UNITED STATES OF AMERICA | § | |
| | § | |
| v. | § | No. 4:17CR217 |
| | § | Judge Crone |
| WILLIAM BROWN | § | |

AMENDED ELEMENTS OF THE OFFENSE

You are charged in Count One of the Indictment with a violation of 26 U.S.C. § 5861, Possession and Receipt of an Unregistered Short Barrel Shotgun. The essential elements which must be proved beyond a reasonable doubt in order to establish a violation of that section are:

26 U.S.C. § 5861, Possession and Receipt of an Unregistered Short Barrel Shotgun

1. That the defendant knowingly possessed or received a firearm;
2. That the firearm was a Remington 12 gauge shotgun, Model 870, Serial Number RS13522X, having a barrel length of less than 18 inches;
3. That the defendant knew of the barrel length of the shotgun was less than 18 inches;
4. That the firearm was or could readily have been put in operating condition;
5. That the firearm was not registered to the defendant in the National Firearms Registration and Transfer Record. It does not matter whether the defendant knew that the firearm was not registered or had to be registered.

Respectfully submitted,

JOSEPH D. BROWN
United States Attorney

_____/s/_____
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was filed via electronic filing to defense counsel on July 24, 2018.

_____/s/_____
TRACEY M. BATSON